

**To:** Jim Stefanoff, CH2M Hill  
**From:** Mary Kay Voytilla, EPA  
**Date:** November 13, 2001  
**Re:** Comments on the draft Responsiveness Summary

Below please find my comments on the draft Responsiveness Summary. I have included a section of general as well as specific comments. In addition, please see the attached redline/strikethrough version of the document for additional specific language changes. I will likely be sending additional comments after I receive comments from other reviewers. I am sending these now so that you may get started on the revisions.

### **General Comments on the Responsiveness Summary**

1. Include a title page on the document. The title page should have the same "title" as the heading on the top of the document. Include the date as "November 2001." Do not show any CH2M Hill references. Include "U.S. Environmental Protection Agency Region 10" on the title page.
2. All references in the document to "DEQ" should be "IDEQ" to be consistent with the ROD Amendment. Please change. Also, search the document for references/abbreviations to South Fork Coeur d'Alene River. Several different way of referring to the South Fork are included in the document. All references should be "SFCd'A River" to be consistent with the ROD Amendment.
3. Include a Table of Contents. The Table of Contents should show the main section title headings.
4. For the main section titles 1., 2., 3., etc., please change to 1.0, 2.0, 3.0, etc. Also in the main section titles please spell out any abbreviations.
5. In the comments, please spell out at least the first time any abbreviated words. Also, if there are simple changes that we can make to the comments to make abbreviated words clearer, go ahead and change them, e.g., instead of "SF" in comment 1.1 just spell out "Superfund." Or, as another example, in comment 6.1, I have no idea what the commenter meant by "CTR" or "NPDWQS." Please check the original comment letter and see if those terms are defined. If so, just write in what they mean. Also see comment 6.2 for references to NAWQS and BSLHHRA and comment 3.3 for reference to "WTP." These are just examples, there are probably others. The document needs to be checked carefully and revised accordingly.
6. In many places in the document the comment refers to a document produced by EPA/CH2M Hill but does not specifically say which document is being referred to, e.g., comment 1.18 refers to the CTP plan Table 2, comment 1.19 refers to "page 9 of the water management plan," comment 3.3 refers to



Section 3.2.3. of something, comment 3.4 refers to Appendix B, comment 3.5 refers to Appendix B of something, comment 3.6 refers to Appendix B, comment 3.7 refers to Table 2 of something, comment 3.8 refers to Table 3, comment 4.2 refers to bullet 4 somewhere, comment 7.1 refers to a "summary" ES-9, (see also 5.2, 5.3, 6.1, 6.2, 6.3, 7.2, ). These are just some examples that I noted. There are many other similar examples in the document that need to be identified. Please review the responsiveness summary, find these and other such similar instances, and change the comments to identify the specific document to which the commenter is referring. You will likely have to go back to the original comment letters.

7. I do not like the word "commentator," please change to and use throughout the document "commenter."
8. All references in the document to "administrative record" should be capitalized, i.e., Administrative Record.
9. Include a "glossary" in the document. There are many abbreviations throughout the document that need to be captured in a glossary section. Here are some that I noticed, please check for others: BHSF, CIA, CTP, OU-4, O&M, AMD, EPA, OU2, FSOB, TMDL, BHSS, ARARs, NWMA's, NPDES, CERCLA, MCL, MCLG, FWQC, PRP, NTR, NCP, KT, gpm, COCs, IDEQ, SFCd'A River, RI/FS, ROD, mg/kg, ACOE, CTR, HHRA, AWQC, NBHMC, ARD, and WTP.
10. Include a reference section in the document. All responses like 1.11, 3.1, 5.3, and 10.3 (these are examples only, there may be other such similar instances that need to be identified) that have full references listed in the response need to be transferred to the reference section. The referenced documents should be cited in the response, e.g., (SAIC, 1992), (CH2M Hill, 2001), etc., but the full listing should be in the reference section. For other responses like 1.7, 1.19, 1.13, 1.18, 6.6, and 7.2 (these are examples only, there may be other such similar instances that need to be identified) that include a discussion of a document, I would like you to include a cite to the document in the response, e.g., (IDEQ and EPA, August 2000), and include the full listing of the document in the reference section.
11. If a comment has multiple parts identified as a), b), and c), (e.g., 1.11, 1.13), the response also needs to be identified as such. For all comments like 1.14, 2.3, 2.4, 4.3, 4.4, and 7.5 that have multiple parts, please identify the parts of both the comment and response as a), b), c), etc. For comments like 7.6 and 7.7, where the comments are listed out in separate line items but the response is in paragraph style, please change the comment to paragraph style also (i.e., don't identify parts a), b), etc., in the comment if its not also identified in the response). For comments like 1.26, 6.6, and 7.6, there is no need to identify the comment in two separate line items. Revise as one paragraph.

### **Specific Comments on the Responsiveness Summary**

12. In the first paragraph of response 1.9 the "o" in "Flood Stanley ore Body" needs to be capitalized. In the fifth paragraph of the same response, there are two periods after 20,000 mg/L.
13. In response to comment 1.14 (the "d" or fourth part of the response), I have struck-out the draft response. Please revise the response. Refer to the final data report where sample results are recorded and discussed. Let the commenter know how sample results compared over the entire sampling program, and how results of the 89 – 90 sample effort compare in general with historical sample results. Also let the commenter know that the data report is available in the Administrative Record at the Kellogg Public library. Include a citation to the report in the response, and a full reference to the report in the reference section.
14. In response to comment 1.19, please include a citation to the treatability study and include a full reference in the reference section.
15. In response to comment 1.15, in the next to last sentence, the author uses the term "using similar procedures." Please clarify the "similar procedures" to which you are referring.
16. Underline "EPA Response" at the beginning of response 5.6.